

Laura R. Jacobsen, Esq. (NSBN 13699)
Jason B. Sifers, Esq. (NSBN 14273)
McDONALD CARANO LLP
2300 West Sahara Avenue, Suite 1200
Las Vegas, Nevada 89102
Telephone: (702) 873-4100
ljacobsen@mcdonaldcarano.com
jsifers@mcdonaldcarano.com

Meagan A. Mihalko, Esq. (VSB No. 80703)
Pro hac vice
TROUTMAN SANDERS LLP
1001 Haxall Pt.
Richmond, Virginia 23219
Telephone: 804-697-1281
meagan.mihalko@troutman.com

Attorneys for Defendant
Early Warning Services, LLC

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

LORITA L. HINES,

Plaintiff,

vs.

CATALYST CORPORATE FEDERAL
CREDIT UNION; EARLY WARNING
SERVICES, LLC; and WELLS FARGO
BANK, NA,

Defendants.

Case No. 2:20-CV-00733-RFB-DJA

STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND TIME FOR
DEFENDANT EARLY WARNING
SERVICES, LLC TO RESPOND TO
COMPLAINT
(Second Request)

Defendant Early Warning Services, LLC (“EWS”) and Plaintiff Lorita L. Hines (“Plaintiff”), by counsel, and pursuant to LR IA 6-1, submit the following Stipulation to Extend Time for Defendant Early Warning Services, LLC to Respond to Complaint, up to an including July 31, 2020. In support of the Stipulation, the parties state the following:

1. EWS signed a waiver of service on or around April 28, 2020 making its responsive pleading due on or around June 29, 2020.

1 2. The undersigned counsel for EWS was retained by EWS in connection with this
2 matter and is continuing to review the allegations asserted in the Complaint.

3 3. The parties previously stipulated to extending EWS's responsive pleading deadline
4 through July 20, 2020.

5 4. Since that time, the parties have been engaged in meaningful settlement discussions
6 that would include a resolution of all pending claims.

7 5. Counsel for Plaintiff has agreed to the requested extension and the requested
8 extension will not impact any other deadlines in this case.

9 6. This is the second request to extend the deadline for EWS to file its responsive
10 pleading.

11 7. This request for an extension of time is not intended to cause any undue delay or
12 prejudice to any party.

13 8. Therefore, the parties hereby stipulate that the deadline for EWS to file its responsive
14 pleading shall be extended through July 31, 2020
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1 DATED: July 21, 2020

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3 KNEPPER & CLARK LLC

TROUTMAN SANDERS LLP

4 By: /s/ Miles N. Clark

5 Matthew I. Knepper, Esq. (NSBN 12796)
6 Miles N. Clark, Esq. (NSBN 13848)
7 5510 S. Fort Apache Rd., Suite 30
8 Las Vegas, NV 89418-7700
9 matthew.knepper@knepperclark.com
10 miles.clark@knepperclark.com

By: /s/ Meagan A. Mihalko

Laura R. Jacobsen, Esq. (NSBN13699)
Jason B. Sifers, Esq. (NSBN 14273)
McDONALD CARANO LLP
2300 West Sahara Avenue, Suite 1200
Las Vegas, Nevada 89102
ljacobsen@mcdonaldcarano.com
jsifers@mcdonaldcarano.com

11 KRIEGER LAW GROUP LLC
12 David H. Krieger, Esq. (NSBN 9086)
13 500 N. Rainbow Blvd., Suite 300
14 Las Vegas, NV 89107
15 dkrieger@kriegerlawgroup.com

Meagan A. Mihalko (VSB No. 80703)
Admitted pro hac vice
1001 Haxall Pt.
Richmond, VA 23219
meagan.mihalko@troutman.com

16 *Attorneys for Plaintiff*
17 *Lorita L. Hines*

Attorneys for Defendant
Early Warning Services, LLC

18 **ORDER**

19 IT IS SO ORDERED.

20 
21 UNITED STATES MAGISTRATE JUDGE

22 DATED: July 22, 2020
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